

<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>EMIL HASHIMAN 14381 RAFAEL ST. CABAZON CALIFORNIA 92230 (909) 450-9668 (909) 541-8445</p> <p><input checked="" type="checkbox"/> Individual appearing without attorney <input type="checkbox"/> Attorney for: _____</p>	<p>FOR COURT USE ONLY</p> <div data-bbox="1019 403 1386 630"><p><b>FILED</b></p><p><b>APR 17 2020</b></p><p>CLERK U.S. BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA BY: _____ Deputy Clerk</p></div>
<p><b>UNITED STATES BANKRUPTCY COURT</b> <b>CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION</b></p>	
<p>In re:</p> <p><b>KOSEP USA, INC.,</b></p> <p>Debtor(s).</p>	<p>CASE NO.: 8:19-BK-14171-ES CHAPTER: SELECT CHAPTER 7</p> <p><b>NOTICE OF OPPOSITION AND REQUEST FOR A HEARING</b></p> <p>COURTROOM: 5A 411 WEST FOURTH STREET SANTA ANA CALIFORNIA 92701 Assigned to: Hon. Erithe A. Smith</p> <p>Hearing Date: <b>04/30/2020 AT 10:30AM</b></p>

1. TO (specify name): DEBTOR, the United States Trustee & creditors and other parties in interest
2. NOTICE IS HEREBY GIVEN that EMIL HASHIMAN aka EMIL HASHEMIEVAN, a party in interest, hereby opposes the following request (specify what is opposed):  
NOTICE OF MOTION FOR: ORDER: (1) APPROVING THE SALE OF THE ESTATE'S INTEREST IN KODE NOVUS I, LLC., A TEXAS LIMITED LIABILITY COMPANY, FREE AND CLEAR OF LIENS PURSUANT TO BANKRUPTCY CODE 363(b)(1) and (f) INCLUDING BREAKUP FEE, SUBJECT TO OVERBIDS, COMBINED WITH NOTICE OF BIDDING PROCEDURES AND REQUEST FOR APPROVAL OF THE BIDDING PROCEDURES UTILIZED: AND (2) GRANTING RELATED RELIEF.
3. This opposition is based upon the following grounds (specify grounds)

**RULE 3002 (c)(2)(6)(B)**

**VITRO S.A.B. de C.V. 701 F.3d 1031, 1054 (5th cir 2012)**

**FAIRFIELD SENTRY LTD; NO 13 CIV 1524 (AKH)**

**THIS INTERESTED PARTY'S IS CONCERNED THAT THIS SALE MAY EFFECT ITS ASSETS IN REAL  
PROPERTY AT 5025 STATE STREET, MONTCLAIR CA 91762 , 5025 E. STATE STREET, ONTARIO CA  
91762, 5025 W STATE STREET ONTARIO CA 91762**

4. Attached hereto are the following documents in support of this opposition which are admissible under the Federal Rules of Evidence (*specify declarations and exhibits by name or description*):

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5. ☐ (Optional) Attached hereto is a Memorandum of Points and Authorities upon which opposing party will rely.

6. Total number of attached pages of supporting documentation: 0

Any reply to this opposition must be filed with the court and served on this opposing party not later than 7 days prior to the hearing on the motion.

WHEREFORE, the undersigned prays that this court deny the subject request and set this matter for a hearing.

Date: 4/13/20

Respectfully submitted,

N/A  
Printed name of law firm

Emil Hashman  
Signature

Emil HASHMAN  
Printed name

Attorney for: \_\_\_\_\_

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
14381 RAFAEL ST CABAZON CA 92230

A true and correct copy of the foregoing document entitled: **Notice of Opposition and Request for a Hearing** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) \_\_\_\_\_, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On (date) 4/13/20, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

U.S. Bankruptcy Court Attn: Hon. Eithra A Smith 411 W 4th St. Suite 5040 San  
Ana CA 92701

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

JAMES - Bastian - Jbastian@Shulmanbastian.com Attorney for Debtor  
Thomas - H Casey - msilva@tomcaseyiaa.com Chapter 7 Trustee  
US Trustee (SA) US Region 16. Sa. ecf@usdoj.gov

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/13/20 EMIL HASTTMAN  
Date Printed Name

Emil Hasttmann  
Signature

KOSEP USA INC.  
12966 EUCLID ST.  
GARDEN GROVE CA 92840

JAMES C BASTIAN  
100 SPECTRUM CTR DR STE 600  
IRVINE CA 92618

CKP  
2010 MAIN STREET STE 520  
IRVINE CA 92614

O MELVENY & MYERS LLC  
400 S HOPE ST. 18TH FLOOR  
LA CA 90071

EMPLOYMENT DEVELOPEMENT  
PO BOX 826880  
SACRAMENTO CA94280

IRS  
PO BOX 7346  
PHILADELPHIA PA 19101

OKLAHOMA EMPLOYMENT  
SECURITY COMMISSION  
P O BOX 52004  
OKLAHOMA CITY OK 73152

FRANCHISE TAX BOARD  
BANKRUPTCY SECTION MS A 340  
PO BOX 2952  
SACRAMENTO CA 95812

KOSEP CO LTD  
123 SADEULRO JINJU  
KYUNGSAN NAMDO  
SOUTH KOREA

SEONGMAN LIM  
4541LACEBARK LN  
FORT WORTH TX 76244

*US Trustee  
411 West Fourth St  
Santa Ana CA 92701*

*Olympic Renewable Platforms LLC  
810 NE 6th St  
Gulfport MS 39422*